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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KYLE A. ALCARAZ,)	CASE NO.: 2:20-cv-01414-JCM-EJY
)	
Plaintiff,)	
)	
vs.)	
)	
CONAGRA BRANDS, INC.; CONAGRA)	
FOODS, INC.; SAM'S WEST, INC. dba)	
SAM'S CLUB; DOES 1 through 10; and ROE)	
BUSINESS ENTITIES 1 through 10, inclusive,)	
)	
Defendants.)	

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES
(First Request)

Pursuant to LR IA 6-1 and LR 26-3, the parties request a 120-day extension of certain discovery deadlines for the reasons set forth below. This is the first request for an extension of discovery, and it is filed at least 21 days before the earliest deadline sought to be extended. In support of this stipulated request, the parties inform the Court of the following:

DISCOVERY COMPLETED

- In connection with the Rule 26(f) conference, the parties served their respective initial disclosures of documents and witnesses, and supplements thereto.

• Defendant, Conagra, has served written discovery requests on Plaintiff. Responses to the same are due, by extension, on or before February 1, 2021.

- Responses to written discovery requests;
- Depositions of Person(s) Most Knowledgeable of Conagra;
- Deposition of Plaintiff;
- Disclosure of initial experts;
- Depositions of initial experts;

The parties reserve the right to engage in other discovery as permitted by applicable rules and within the discovery window.

Plaintiff has requested dates of availability for the deposition of the Person Most Knowledgeable of Conagra. Counsel for Conagra is working to identify the correct individual(s). COVID-19 closures have made discovery difficult and the current circumstances necessitate the instant extension. In addition, both sides are in dispute over Defendant's proposed protective order and Plaintiff lacks required documents to prepare for depositions because of such limitations; the parties are awaiting the Court's order.

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PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY

The following table sets forth the current discovery deadlines and the proposed extended discovery deadlines that are the subject of this stipulated request:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Filing motions to amend the pleadings or to add parties	1/4/2021	5/4/2021
Disclosure of initial experts	2/2/2021	6/2/2021
Disclosure of rebuttal experts	3/4/2021	7/2/2021
Discovery Cut-Off	4/2/2021	8/2/2021
Filing dispositive motions	5/3/2021	8/31/2021
Filing joint pretrial order	6/2/2021	9/30/2021


This request for an extension of time is not sought for an improper purpose including delay.

DATED this 22 day of December, 2020.

DATED this 16th day of December, 2020.

BENSON & BINGHAM

LEWIS ROCA ROTHGERBER CHRISTIE, LLP

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/s/ J. Christopher Jorgensen
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IT IS SO ORDERED:


 UNITED STATES MAGISTRATE JUDGE

DATED: December 22, 2020

